

February 6, 2017

VIA ECF

Honorable Kimba M. Wood, U.S.D.J
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: ***Sands v. Moviepilot, Inc.***
Docket No. 1:16-cv-05098 KMW

Dear Judge Wood,

We are counsel for Plaintiff Steve Sands in the above-referenced action.

Pursuant to this Court's Individual Rules of Practice, the Plaintiff hereby request an extension of time for Plaintiff to oppose the Defendant's Motion for Summary Judgment. The Defendant filed the most recent Motion for Summary Judgment and a Rule 56.1 Statement on January 24, 2017. The current deadline to oppose that motion is February 7, 2017. This is Plaintiffs' first request for an extension. This request is not on consent, since the Defendant falsely believes that its original filing dated 01/10/2017, which was kicked by EFC, entitles it to a default on a summary judgment motion. It is clear, however, that the

We thank the Court for its attention to this request.

Respectfully Submitted,

/s/Richard Liebowitz
Richard Liebowitz
Yekaterina Tsyvkin
Liebowitz Law Firm, PLLC
11 Sunrise Plaza, Suite 305
Valley Stream, NY 11580
516-233-1660
RL@LiebowitzLawFirm.com

Attorneys for Plaintiffs Zlozower and Levine